

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

ROTHSCHILD CONNECTED DEVICES INNOVATIONS, LLC;	§	
	§	
	§	
Plaintiff,	§	
	§	
	§	
VS.	§	CIVIL CASE NO. 4:21-CV-479
	§	COMPLAINT FOR DECLARATORY
CONSTANCE KAZANJIAN;	§	JUDGMENT
	§	JURY DEMAND
Defendant.	§	

PLAINTIFF'S RULE 41 VOLUNTARY DISMISSAL

TO THE HONORABLE COURT:

COMES NOW PLAINTIFF, ROTHSCHILD CONNECTED DEVICES INNOVATIONS, LLC (RCDI), giving Notice that it desires to DISMISS WITHOUT PREJUDICE its claims against Constance Kazanjian pursuant to FRCP 41(a).

1. Defendant has not filed an answer nor a motion for summary judgment. This matter is not a class action under FRCP 22 nor an application for a receiver under FRCP 66. Likewise there has been no previous dismissal of these claims against Constance Kazanjian in State or Federal courts. Therefore this dismissal is without prejudice. FRCP 41(a).
2. To the extent the Court requires an order, a Proposed Order is attached.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that this matter be dismissed WITHOUT PREJUDICE.

Respectfully submitted,

HIGDON LAWYERS

/s/Christopher D. Bertini

PAUL HIGDON

State Bar No. 09590700

CHRISTOPHER D. BERTINI

State Bar No. 02256060 Fed. No. 12759

4900 Fournace Place, Suite 460

Bellaire, TX 77401

Tel: (713) 223-7300

Fax: (713) 223-7331

staff@higdonlawyers.com E-filing

chris@higdonlawyers.com

ATTORNEY FOR PLAINTIFF